

Nathan L. Scheg, SBN 197282
IRONHORSE LAW GROUP, PC
1820 Bonanza Street, Ste. 200
Walnut Creek, CA 94596
(925) 399-6108 Phone
(925) 215-8427 eFax

Attorneys for Plaintiff Christina Verhoek

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINA VERHOEK, an
individual,

Plaintiff,

vs.

U.S. BANK NATIONAL
ASSOCIATION, a business entity of
unknown form; U.S. BANK HOME
MORTGAGE, a business entity of
unknown form; and DOES 1-50,

Defendants.

Case No. 14-cv-04821-EMC

[Assigned to the Honorable Edward M.
Chen]

**REQUEST AND STIPULATION TO
EXTEND TIME TO FILE FIRST
AMENDED COMPLAINT**

[filed: September 30, 2014]

TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:

Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
Mortgage) (“US Bank”) filed a motion to dismiss Plaintiff Christina Verhoek
 (“Verhoek”)’s Complaint. At the hearing on the motion to dismiss held on January
29, 2015, the Court and the parties discussed the timeline pled in the Complaint
regarding the loan modification submission, trial period plan offer and denial of a
permanent modification. The Court granted Verhoek leave to amend the complaint
to address some of the issues raised at the hearing. US Bank has subsequently sent

Verhoek documents showing what it claims is the true timeline of submissions and indicated its belief that the Complaint contained material misrepresentations in violation of FEDERAL RULE OF CIVIL PROCEDURE, RULE 11(b). Verhoek's counsel needs additional time to review the documents before filing a First Amended Complaint. US Bank and Verhoek have stipulated to extend Verhoek's time to file a First Amended Complaint.

The parties therefore stipulate and agree that, with the Court's permission and order, Verhoek's time to file a First Amended Complaint is continued to March 6, 2015. US Bank shall have 21 days from the filing of the First Amended Complaint to respond to it, including through a motion to dismiss. US Bank has not waived any objection to the venue or to the jurisdiction of the court over the person of the defendant, or any other challenge to the complaint or other pleadings in this case.

DATED: February 25, 2015

By /s/ Frederick A. Haist
 E. SCOTT PALMER
 FREDERICK A. HAIST
 PALMER, LOMBARDI & DONOHUE LLP
 Attorneys for US Bank N.A.

DATED: February 25, 2015

By /s/ Nathan L. Scheg
 NATHAN L. SCHEG
 IRONHORSE LAW GROUP, PC
 Attorneys for Christina Verhoek

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/5, 2015

United States

